

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**National Association Of Social  
Workers, et al.,**

Plaintiffs,

v.

**City of Lebanon, Ohio, et al.,**

Defendants.

Case No. 1:22-cv-00258-SJD

Judge Susan Dlott

**UNOPPOSED MOTION TO EXTEND TIME TO FILE  
ANSWER OR RULE 12(b) MOTIONS**

The deadline for the defendants to file their answer or Rule 12(b) motions is Tuesday, July 5, 2022. The defendants respectfully request a 30-day extension, which would require the defendants to file their answer or Rule 12(b) motions by Thursday, August 4, 2022. The plaintiffs are unopposed to this request.

The defendants are requesting this extension of time because the city of Lebanon is in the process of amending its ordinance in response to the plaintiffs' lawsuit, as set forth in the parties' stipulation of May 26, 2022 (ECF No. 18), and the city has been awaiting the Supreme Court's recently announced decision in *Dobbs v. Jackson Women's Health Organization*, --- S. Ct. ----, 2022 WL 2276808 (June 24, 2022), before deciding on the content of the amendments. The defendants expect to have the amended ordinance enacted by the end of next month, and they expect the amendments to obviate most if not all of the plaintiffs' claims. It would therefore serve judicial economy and conserve the parties' resources to extend the deadline for answering the complaint until after the city enacts the amended ordinance.

## CONCLUSION

The motion to extend the deadline for filing an answer or Rule 12(b) motion should be granted.

Respectfully submitted.

JOSEPH C. PICKENS  
Ohio Bar No. 0076239  
*Trial Attorney*  
Isaac Wiles  
Two Miranova Place, Suite 700  
Columbus, Ohio 43215-5098  
(614) 340-7416 (phone)  
(614) 365-9516 (fax)  
jpickens@isaacwiles.com

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL\*  
Texas Bar No. 496344  
Mitchell Law PLLC  
111 Congress Avenue, Suite 400  
Austin, Texas 78701  
(512) 686-3940 (phone)  
(512) 686-3941 (fax)  
jonathan@mitchell.law

\* admitted *pro hac vice*

Dated: June 29, 2022

*Counsel for Defendants*

**CERTIFICATE OF CONFERENCE**

I have conferred with Jessie Hill, counsel for the plaintiffs, and she informed me that the plaintiffs are unopposed to this motion.

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I certify that on June 29, 2022, I served this document through CM/ECF upon:

B. JESSIE HILL  
FREDA J. LEVENSON  
ELENA M. THOMPSON  
REBECCA KENDIS  
ACLU of Ohio Foundation  
1108 City Park Avenue, Ste. 203  
Columbus, OH 43206  
Phone: (216) 368-0553 (Hill)  
(614) 586-1972  
Fax: (614) 586-1974  
[bjh11@case.edu](mailto:bjh11@case.edu)  
[flevenson@acluohio.org](mailto:flevenson@acluohio.org)  
[ethompson@acluohio.org](mailto:ethompson@acluohio.org)  
[rebecca.kendis@case.edu](mailto:rebecca.kendis@case.edu)

JOHN LEWIS  
KRISTEN MILLER  
SEAN LEV  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, DC 20043  
(202) 601-2483  
[jlewis@democracyforward.org](mailto:jlewis@democracyforward.org)  
[kmiller@democracyforward.org](mailto:kmiller@democracyforward.org)  
[slev@democracyforward.org](mailto:slev@democracyforward.org)

*Counsel for Plaintiffs*

/s/ Jonathan F. Mitchell  
JONATHAN F. MITCHELL  
*Counsel for Defendants*